

EXHIBIT A

**DECLARATION OF ABDULRAHMAN KHAN UNDER 28 U.S.C. § 1746 IN SUPPORT
OF PLAINTIFF'S CLAIM THAT MANY BUSINESS PROJECTS WERE LOST,
DELAYED, AND/OR DIMINISHED DUE TO AARON ABADI'S INABILITY TO TRAVEL**

I, Abdulrahman Khan, do hereby declare and state as follows:

1. I am over eighteen years of age and I make this declaration under penalty of perjury.

2. This declaration is submitted in connection with National Environmental Group, LLC's ("NEG") various projects described below.

3. I have served as NEG's Chief Operating Officer ("COO") for the Middle East since February 2014. As part of my duties as COO, I negotiate contracts for the sale of equipment, installation of projects, and other services for NEG. I report to NEG's Chief Executive Officer, Aaron Abadi, who is based at NEG's main office in New York, New York.

4. I was born in Saudi Arabia and currently live there. My native language is Arabic, so I am fluent speaking, reading and writing it. I am also fluent speaking, reading and writing in English. In this regard, I lived in Colorado from 2012-2013. From 2013 through 2015, I lived in New York, New York, where I attended Wagner College. I lived in the United Kingdom from 2018-2019, while I pursued my PhD in microbiology at University of York.

5. On behalf of NEG, I served as the lead negotiator for the sale of ten (10) gas-fired turbine generator mobile power plant units by NEG that led to the consummation of the Turbine Purchase Agreement between NEG and Sheikh Butti Al Maktoum ("Sheikh Butti") dated as of October 6, 2020. Sheikh Butti is a member of the

UAE royal family. I personally signed the TPA for NEG (along with NEG CEO Aaron Abadi) once agreement was reached on all terms.

6. On behalf of NEG, I served as the lead negotiator for the three joint venture agreements (“JVA”) signed with Bnook Holding Company of Jeddah, Saudi Arabia. One JVA was to build a chemical factory to produce Dimethyl disulfide (DMDS), with a funding commitment of \$200 Million Dollars USD. The other JVA was to build multiple waste to energy power plants, with a funding commitment of \$1.08 Billion Dollars USD. The third agreement was to fund, produce, and market a technology that will cure Covid, certain cancers, and various other viruses and diseases, with a funding commitment in excess of \$60 Million USD.

7. These agreements were all executed in early May, of 2021, by myself and by our CEO, Mr. Abadi, and the funding was to be expected to begin within those next few months.

8. Sheikh Butti of United Arab Emirates reneged on his deal and was refusing to move forward as agreed. I asked Mr. Abadi to come down in person, but he could not get any airline to fly him, as he has a disability and cannot wear a mask.

9. I am very confident that had Mr. Abadi shown up in person, the outcome would be very different and the Sheikh would have completed the deal as agreed.

10. In this part of the world, the wealthy Sheikhs, Princes, and businessmen do not normally use zoom or any other video conferencing technology. These are our traditional ways that do not change easily. Additionally, there’s a certain distrust that is common amongst these people, if you’re not there in front of them.

11. Mr. Abadi is a very personable man and has been in business for over thirty years. I have seen him operate, and in business he can come in to the people we are in contract with, in person, and help resolve the issues that caused the problems. This is not something that can be done by phone, video, or any other way. He needed to be here in person. I am confident that had he shown up, the deals would have worked out fine.

12. In this part of the world, business is done in person. They like to see who they're working with and get to know each other.

13. These Sheikhs are very connected politically, and they confirmed that they will get Mr. Abadi special access to enter their respective countries, in spite of any Covid related restrictions.

14. Being that he was not able to make it in person, the deal with Sheikh Butti fell through completely and we did not receive a penny. We sued in the United States District Court of Connecticut, and received a judgment in September 2022, for \$140 Million Dollars USD (3:21CV01046(SALM), please look up that case on your pacer accounts. Now, we will have to spend millions of dollars on asset searches across the globe, in order to retrieve the moneys owed to us. It is not a simple process, and can take years.

15. Similarly, the owner and executives at Bnook Holding Company requested to see Mr. Abadi in Saudi Arabia in person, or they will not go through with their commitments.

16. Mr. Abadi and I were on the phone constantly trying to see if he can get a flight to Saudi Arabia, and he made enormous efforts to do that. Unfortunately, due to

the airlines forbidding him to fly, he could not arrive in time and they too reneged on those three deals.

17. We do plan to sue them also, and expect to attain a judgment there too, as the contracts are strong and clear. However, getting a judgment is not the same as getting money, and the process can easily take a year just to get the judgment, giving them more than enough time to hide their assets. Then the intensive, extensive, and expensive asset search process takes place.

18. Both those two countries are not signatories to the Hague Convention with the United States and therefore make it complicated to enforce a U.S. judgment.

19. A similar situation happened with an agreement we were working on before the Covid epidemic with a group called Bin Shamikh Group, which are affiliates of the Royals in Saudi Arabia. The deal was not working out well. Mr. Abadi hopped on a plane and came here to Jeddah and we all met together with the Bin Shamikh Group, signed the joint venture agreements, and developed a very strong relationship. We expect to do many successful projects together. This was around 2015. Had Mr. Abadi not flown in, this relationship would have never happened.

20. Another example, is during 2018, we were negotiating with KA Care, which is responsible for nuclear energy in Saudi Arabia. It is a government entity. Mr. Abadi was able to fly in upon their request, and we also developed a solid relationship with them, and expect to do some major projects together.

21. This is how we operate in this region. I take care of all the prior conversations and discussions with my people here. Then when it is the right time, the point of execution, Mr. Abadi shows up, spends time with the people, and closes the

deal. This system works very well in this region. He cannot show up too early, and he cannot show up too late. There is a point where the deal is ready to close, and that is when he is needed. Additionally, he is needed and must show up when there is damage control required, if a deal and/or relationship needs help.

22. Recently, there have been a lot of scammers trying to take advantage of the investors in this region. Everyone is a bit on edge with a lot of paranoia. Then when they ask me, "where is Mr. Abadi?" I do not have a good answer. They want to understand why the CEO does not show up in person for a multimillion-dollar joint venture agreement. I try to tell them that he cannot come due to Covid restrictions, but it is really hard to get that idea across. Then a little paranoia kicks in and the deal is lost. We lost many other deals due to these travel restrictions that I haven't even presented here.

23. In summation, it is very clear to me that the fact that Mr. Abadi was unable to travel, caused us to lose all these extremely lucrative business deals. The value of each deal to NEG, is at least as high as the money to be invested into them. Meaning if a person will invest a hundred million dollars in a project in order to own equal amount of equity with NEG, then NEG's equal shares would be worth at least that amount, a hundred million dollars. It is pretty simple math and logic.

I declare and certify under penalty of perjury under the laws of the United States of America that the foregoing is true and accurate to the best of my knowledge, information and belief.

Executed on: December 31, 2022



Abdulrahman Khan